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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 JOAL, LLC, a Nevada limited liability  
11 company,

Case No. 2:19-cv-01523

12 Plaintiff,

13 vs.

14 TRAILBOSS ENTERPRISES, INC., a foreign  
corporation; and DOES I through X, inclusive;  
15 and ROE CORPORATIONS I through X,  
inclusive,

16 **STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO  
REPLY TO TRAILBOSS ENTERPRISES,  
INC'S MOTION TO DISMISS JOAL,  
LLC'S COMPLAINT**  
**(FIRST REQUEST)**

17 Defendant.  
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Plaintiff JOAL, LLC, a Nevada limited liability company ("Plaintiff") and Defendant TRAILBOSS ENTERPRISES, INC., a foreign corporation ("Defendant"), by and through their undersigned counsel, stipulate and agree as follows:

1. On September 6, 2019, Defendant filed its Motion to Dismiss JOAL, LLC's Complaint (Document 3). The time for Plaintiff to respond to Defendant's Motion to Dismiss, shall be extended from September 20, 2019, to September 27, 2019.


2. Plaintiff has good cause for the extension as Plaintiff's counsel is currently unavailable due to a trial scheduled to begin on September 23, 2019, which is consuming his time in preparation.

Accordingly, Plaintiff and Defendants respectfully request that the Court grant this request to continue the deadline for Plaintiff to file its Reply to TRAILBOSS ENTERPRISES, INC.'s

1 Motion to Dismiss JOAL, LLC's Complaint from September 20, 2018 to September 27, 2019.

2 DATED: September 18, 2019  
3 T. JAMES TRUMAN & ASSOCIATES

DATED: September 18, 2019.  
HOLLAND & HART, LLP

4 By:   
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12 **ORDER**

13 IT IS SO ORDERED September 23, 2019.

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15 UNITED STATES DISTRICT COURT JUDGE